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RAN SINGH GHUMAN,

v.

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12 KIKA SCOTT, et al., 1

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UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

Plaintiff,

Defendants.

Case No. 2:25-cv-00063-JHC

STIPULATED MOTION TO HOLD CASE IN ABEYANCE AND ORDER

Noted for Consideration: May 29, 2025

Plaintiff and Defendants, by and through their counsel of record, pursuant to Federal Rule of Civil Procedure 6 and Local Rules 7(d)(1), 10(g) and 16, hereby jointly stipulate and move to hold these proceedings in abeyance until November 13, 2025, for good cause. Plaintiff brought this litigation pursuant to the Administrative Procedure Act and Mandamus Act seeking, *inter alia*, to compel U.S. Citizenship and Immigration Services ("USCIS") to adjudicate his asylum application. Defendants' response to the Complaint is currently due on June 6, 2025. The parties are currently working towards a resolution to this litigation.

STIPULATED MOTION TO HOLD CASE IN ABEYANCE AND ORDER

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¹ Pursuant to Federal Rule of Civil Procedure 25(d), Defendants substitute Senior Official Performing the Duties of the Director of U.S. Citizenship and Immigration Services Kika Scott for Ur M. Jaddou, Department of Homeland Security Secretary Kristi Noem for Alejandro Mayorkas, and United States Attorney General Pamela Bondi for Merrick Garland.

Courts have "broad discretion" to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706 (1997). "[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants." *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ. P. 1.

With additional time, this case may be resolved without the need of further judicial intervention. USCIS has scheduled Plaintiff's asylum interview for July 16, 2025, and anticipates diligently working toward completing adjudication of Plaintiff's asylum application within 120 days of the interview, absent unforeseen or exceptional circumstances that would require additional time for adjudication. If the adjudication is not completed within that time, the parties will provide a status report to the Court. If Plaintiff wishes to submit additional evidence not previously submitted with his asylum application, he will submit it to the asylum office at least seven to ten days before his interview date. Plaintiff recognizes that failure to submit documents prior to the interview may require the interview to be rescheduled and the adjudication delayed. If needed, Plaintiff will bring an interpreter to the interview; otherwise, the interview will need to be rescheduled and the adjudication delayed. Once the application is adjudicated, Plaintiff will dismiss this case with each party to bear their own litigation costs and attorneys' fees. Accordingly, the parties request this abeyance to allow USCIS to conduct Plaintiff's asylum interview and then process his asylum application.

As additional time is necessary for this to occur, the parties request that the Court hold the case in abeyance until November 13, 2025. The parties will submit a status update on or before November 13, 2025.

DATED this 29th day of May, 2025. 2 Respectfully submitted, TEAL LUTHY MILLER MULTANI LAW GROUP, PLLC Acting United States Attorney 4 s/ Sean M. Arenson s/ Jashan Multani SEAN M. ARENSON, WSBA No. 60465 JASHAN MULTANI, WSBA No. 60073 Assistant United States Attorney Multani Law Group, PLLC United States Attorney's Office 512 W Meker St Western District of Washington Kent, Washington 98042 700 Stewart Street, Suite 5220 Phone: (206) 243-4219 Seattle, Washington 98101 Email: jashan@multanilawgroup.com Phone: (206) 553-7970 Fax: (206) 553-4067 Attorney for Plaintiff Email: sean.arenson@usdoj.gov Attorneys for Defendants 11 I certify that this memorandum contains 392 words, in compliance with the Local Civil Rules. 12 13 14 15 16 17 18 19 20 21 22 23 24 STIPULATED MOTION TO HOLD CASE IN ABEYANCE AND ORDER

[Case No. 2:25-cv-00063-JHC] - 3

ORDER The case is held in abeyance until November 13, 2025. The parties shall submit a joint status report on or before November 13, 2025. It is so **ORDERED**. DATED this 29th day of May, 2025. John H. Chun JOHN H. CHUN United States District Judge

STIPULATED MOTION TO HOLD CASE IN ABEYANCE AND ORDER [Case No. 2:25-cv-00063-JHC] - 4